

## **Affidavit of Service of Process**

Bret Grote, Esquire  
Abolitionist Law Center  
P.O. Box 8654  
Pittsburgh, PA 15221

**Jacob Jung; James Jung, as Administrators of the Estate of Louis Jung, Jr.**

v.

**United States District Court for the  
Eastern District of Pennsylvania  
Case No.: 2:24-cv-05618-TJS**

**City of Philadelphia; YesCare Corp., et al.**

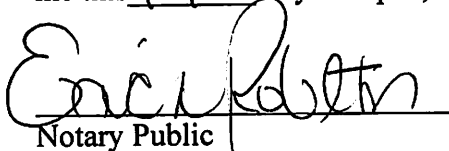
1. I, Tom Bailey, state that I am a staff Investigation employed by Confidential Investigative Services, Inc. Confidential Investigative Services is a Private Detective Agency licensed by the Commonwealth of Pennsylvania and located at 235 South 13<sup>th</sup> Street, Philadelphia, PA 19107.
2. Prior to making efforts at service, searches were performed of social media and photographs of Blair Cabellos were found on her Facebook account. Copies of the photos are attached. On April 16, 2025, at 1:00 p.m., I approached the front door of the home located at 164 East Parkway Avenue in Chester, PA. The female inside the home would not identify herself as Ms. Cabellos however based on the photographs obtained, I was able to positively identify the female as Blair Cabellos. The front door was open however Ms. Cabellos would not approach. The Summons and First Amended Complaint were left inside the front door. Ms. Cabellos was advised that she had been served.
3. Ms. Cabellos appears to be of Hispanic descent and in her 20s. She is approximately 5'6" tall and 150 pounds. Ms. Cabellos has long, dark hair and was not wearing glasses at the time of service.

I, Tom Bailey, state that the foregoing statements made by me are true and correct. I am aware I may be punished if any of the above statements are found to be untrue.



\_\_\_\_\_  
Tom Bailey

Sworn to and subscribed before  
me this 17<sup>th</sup> day of April, 2025

  
Notary Public

Commonwealth of Pennsylvania - Notary Seal  
Erica Robertson, Notary Public  
Philadelphia County  
My Commission Expires December 15, 2026  
Commission Number 1259604

AO 440 (Rev. 06/12) Summons in a Civil Action

# UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

JACOB JUNG; JAMES JUNG,  
as Administrators of the Estate of LOUIS JUNG, JR

*Plaintiff(s)*

v.

CITY OF PHILADELPHIA; BLANCHE CARNEY, Former  
Commissioner of Philadelphia Dept. of Prisons; LALITHA  
TRIVIKRAM; MAUREEN GAY; YesCare Corp.; MARIESHA  
APOLLON; BLAIR CABELLOS; GENA FRASIER; WANDA  
BLOODSAW

*Defendant(s)*

Civil Action No. 24-cv-05618

## SUMMONS IN A CIVIL ACTION

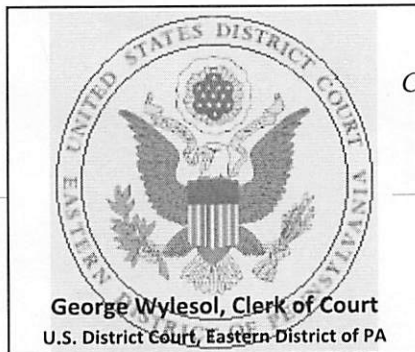
To: *(Defendant's name and address)* Blair Cabellos

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

BRET GROTE  
ABOLITIONIST LAW CENTER  
POBOX 8654  
PITTSBURGH, PA 15221

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.



CLERK OF COURT

*s/Ashley Mastrangelo*

*Signature of Clerk or Deputy Clerk*

Date: 3/14/25

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Civil Action No. 24-cv-05618

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for (name of individual and title, if any) Blair Cabellos  
was received by me on (date) \_\_\_\_\_

☒ I personally served the summons on the individual at (place) 164 E. Parkway Avenue, Chester, PA  
on (date) 4/16/25 ; or

☐ I left the summons at the individual's residence or usual place of abode with (name) \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on (date) \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on (name of individual) \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of (name of organization) \_\_\_\_\_  
on (date) \_\_\_\_\_ ; or

☐ I returned the summons unexecuted because \_\_\_\_\_ ; or

☐ Other (specify): \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_

I declare under penalty of perjury that this information is true.

Date: 4/22/25

Thomas M. Bailey  
Server's signature

Thomas M. Bailey, Senior Investigator  
Printed name and title

235 S. 13<sup>th</sup> St. Philadelphia, PA 19107  
Server's address

Additional information regarding attempted service, etc: